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**EXHIBIT
B**

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August 14, 2025

VIA EMAIL turner.falk@saull.com

VIA EMAIL carmen.contreras-martinez@saull.com

Turner N. Falk
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186

Carmen Contreras-Martinez
Saul Ewing LLP
701 Brickell Avenue, 17th Floor
Miami, FL 33131

Re: Case 24-03028-swe; *Areya Holder Aurzada, Chapter 7 Trustee for the Bankruptcy Estate of Dennis James Rogers II v. Funderz.net, LLC* in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division

Dear Counsel:

I have attached deposition notices for Joseph Isaacoff and a corporate representative(s) for Funderz. Of course, I would have preferred to receive your available dates as I previously requested. If you can provide dates within a reasonable time period, I will work with you to change these dates with an agreed motion to extend discovery deadlines solely for the purpose of taking these depositions. I cannot agree to a continuance of the trial setting at this time.

After some further coordination with the Bureau of Prisons, I will shortly be sending a notice for the deposition of Dennis Rogers.

Very truly yours,

/s/ David B. Miller

David B. Miller

DBM:kay
Attachments
cc: Micah Dortch

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: DENNIS JAMES ROGERS II, Debtor.	§ § §	CASE NO. 22-30500-swe7 CHAPTER 7
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AREYA HOLDER AURZADA,
CHAPTER 7 TRUSTEE FOR THE
BANKRUPTCY ESTATE OF
DENNIS JAMES ROGERS II
Plaintiff,

§
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v.

Adversary No. 24-03028

FUNDERZ.NET, LLC,
Defendant.

**PLAINTIFF AREYA HOLDER AURZADA, CHAPTER 7 TRUSTEE FOR THE
BANKRUPTCY ESTATE OF DENNIS JAMES ROGERS II'S AMENDED NOTICE
TO TAKE THE ORAL DEPOSITION OF FUNDERZ.NET, LLC'S
CORPORATE REPRESENTATIVE**

TO: Defendant Funderz.net, LLC, by and through its counsel of record, Turner N. Falk, Saul Ewing LLP, Centre Square West, 1500 Market Street, 38th Floor, Philadelphia, PA 19102-2186 and Carmen Contreras-Martinez, Saul Ewing LLP, 701 Brickell Avenue, 17th Floor, Miami, FL 33131.

Please take notice that Plaintiff will take the oral deposition of the Corporate Representative of Funderz.net, LLC on **Wednesday, August 20, 2025 beginning at 9:00 a.m. CST** via Zoom or other similar technology. A video link will be provided to counsel prior to the deposition. This deposition will be taken before an officer authorized by law to take depositions and will continue from day to day until completed and may be used, in whole or in part, as evidence in this case. This deposition may be videotaped. The witness will be examined on the topics identified in the attached **Exhibit A**. You are invited to attend and examine the witness.

Dated: August 14, 2025

Respectfully submitted,

By: /s/ David B. Miller

David B. Miller
Texas Bar No. 00788057
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and
T. Micah Dortch
Texas Bar No. 24044981
Dortch Lindstrom Livingston Law Group
2613 Dallas Parkway, Suite 220
Plano, TX 75093
Telephone: 214-252-8258
Facsimile: 888-653-3299

Special Counsel for the Trustee

CERTIFICATE OF SERVICE

I certify that on August 14, 2025, I caused a copy of the foregoing document to be served via electronic mail to the counsel listed below:

Funderz.Net, LLC
c/o Carmen Contreras-Martinez
SAUL EWING LLP
701 Brickell Avenue, Suite 1700
Miami, FL 33131
carmen.contreras-martinez@saul.com

-and-

Turner N. Falk
SAUL EWING LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
turner.falk@saul.com

Counsel to Funderz.Net, LLC

/s/ David B. Miller

David B. Miller_

EXHIBIT A

1. Any affirmative defenses or other defenses of Funderz to the allegations in the above-referenced lawsuit;
2. Funderz' factual responses to the claims and allegations of the lawsuit;
3. Communications between Funderz and Dennis Rogers, the Rogers' controlled entities, identified in the lawsuit, or anyone else acting on behalf of Rogers;
4. The terms and documentation of the transaction between Funderz and OMTC at issue in the lawsuit;
5. Money or other assets transferred to OMTC, Dennis Rogers or any other Rogers' controlled entity;
6. Money or assets received from OMTC, Dennis Rogers or any other Rogers' controlled entity. Specifically, all of the background and calculation of the \$11.5 million Funderz claims to have received;
7. Due diligence conducted by Funderz at any time related to the transaction between Funderz, OMTC, and Rogers at issue in the lawsuit including, but not limited to, any investigative report, applications or background information supplied by Rogers and/or OMTC, public records gathered and documents created;
8. Documents obtained by Funderz from Dennis Rogers or any other Rogers' controlled entity;
9. The subsequent transfers of any money or assets received from OMTC, Dennis Rogers or any other Rogers' controlled entity;
10. The facts alleged by Funderz in Cause No. DC-20-01897; *Funderz.net LLC v. OMTC, Inc. and Dennis James Rogers, II* in the 191st District Court of Dallas County, Texas including, but not limited to, the facts alleged in paragraphs 19-24 of the Third Amended Petition;
11. The corporate structure of Funderz including, but not limited to, any alter egos, successor entities, d/b/a's, officers, members, partners, subsidiaries, and owners;
12. The corporate records of Funderz including, but not limited to, minutes, resolutions, ownership, compliance with state registration requirements, and documents showing the status, dissolution or inactivity in the last 5 years; and
13. The factual allegations, claims, responses and settlement in the Lateral Recovery v. Funderz et al suit in the Southern District of New York.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: DENNIS JAMES ROGERS II, Debtor.	§ § §	CASE NO. 22-30500-swe7 CHAPTER 7
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AREYA HOLDER AURZADA, CHAPTER 7 TRUSTEE FOR THE BANKRUPTCY ESTATE OF DENNIS JAMES ROGERS II Plaintiff,	§ § § § § § § § § §	 Adversary No. 24-03028 FUNDERZ.NET, LLC, Defendant.
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**PLAINTIFF AREYA HOLDER AURZADA, CHAPTER 7 TRUSTEE FOR THE
BANKRUPTCY ESTATE OF DENNIS JAMES ROGERS II'S AMENDED NOTICE TO
TAKE THE ORAL DEPOSITION OF JOSEPH ISAACOFF**

TO: Defendant Funderz.net, LLC, by and through its counsel of record, Turner N. Falk, Saul Ewing LLP, Centre Square West, 1500 Market Street, 38th Floor, Philadelphia, PA 19102-2186 and Carmen Contreras-Martinez, Saul Ewing LLP, 701 Brickell Avenue, 17th Floor, Miami, FL 33131.

Please take notice that Plaintiff will take the oral deposition of JOSEPH ISAACOFF ("Mr. Isaacoff") on **Thursday, August 21, 2025, beginning at 9:00 a.m.** via Zoom or other similar technology. If virtual, a video link will be provided to Mr. Isaacoff and any counsel prior to the deposition. This deposition will be taken before an officer authorized by law to take depositions and will continue from day to day until completed. This deposition may be videotaped. Said deposition, when so taken and returned according to law, may be used at the trial of this cause.

Dated: August 14, 2025

Respectfully submitted,

By: /s/ David B. Miller

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Special Counsel for the Trustee

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c/o Carmen Contreras-Martinez
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Miami, FL 33131
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-and-

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Counsel to Funderz.Net, LLC

/s/ David B. Miller

David B. Miller_